

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS

ANANDA CAMARGO CHAVEZ,  
*Plaintiff,*

v.

REBUILT BROKERAGE LLC d/b/a  
REBUILT REALTY AND REBUILT  
OFFERS LLC  
*Defendant.*

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Case No. 1:24-cv-504-RP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**

COMES NOW, Defendants Rebuilt Brokerage LLC d/b/a Rebuilt Realty and Rebuilt Offers LLC (collectively the “Defendants”), and files this Unopposed Motion for Extension of Time to File Response as follows:

1. Plaintiff filed her Motion for Sanctions on December 17, 2024. Doc. 23.
2. Pursuant to Local Rule CV-7(d)(2), Defendants’ response was due seven (7) days after the filing of the motion. Defendants’ Response is currently due on December 24, 2024—Christmas’ Eve.
3. Due to the holidays, as well as the nature of Plaintiff’s Motion, Defendants request additional time to prepare its responsive briefing.
4. To this end, Defendants request an extension of the due date of its Response to January 3, 2025.
5. This will enable Defendants to properly response to the Motion and will make it due after the holiday season.
6. This is the only request Defendants have sought concerning this deadline.
7. Defendants’ counsel has conferred with counsel for Plaintiff, and Plaintiff is unopposed.

WHEREFORE, PREMISES CONSIDERED, Defendants Rebuilt Brokerage LLC d/b/a Rebuilt Realty and Rebuilt Offers LLC, respectfully request this Court grant this Unopposed Motion for Extension of Time to File Response, and extend the response date for Defendants to January 3, 2025.

Respectfully submitted,

**MARTIN GOLDEN LYONS**  
**WATTS MORGAN PLLC**

/s/ Xerxes Martin

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***COUNSEL FOR DEFENDANTS***

**CERTIFICATE OF CONFERENCE**

Counsel for Defendants conferred with counsel for Plaintiff via email on December 23, 2024, regarding the relief sought herein. Plaintiff is unopposed.

/s/ Xerxes Martin

EUGENE XERXES MARTIN, IV

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been forwarded via CM/ECF system to all parties entitled to notice of the same on this 23rd day of December 2024.

/s/ Xerxes Martin

EUGENE XERXES MARTIN, IV